Claims 1, 2, 4, 7 - 10, 12 and 14 are amended merely to correct informalities and are not amended in a manner that narrows the scope of the claims nor are they amended for reasons related to patentability.

Claims 1 - 15 are rejected under 35 USC §102(e) as being anticipated by Ferrel et al. (hereinafter "Ferrel"). Applicant respectfully traverses the rejection for at least the following reasons.

Claim 1 is directed to a method for facilitating creation and manipulation of compilations of content. The claim recites providing a functional layer for interfacing with a user interface and a data repository. The functional layer includes a plurality of function modules in which each module is for executing a function pertaining to the creation or manipulation of a compilation of content. As described in the specification the invention allows a user to interface with a digital library to retrieve and view content objects stored therein, select objects for inclusion in a compilation of content, create new objects for inclusion in the compilation and for storage in the digital library, and submit the completed compilation for approval. *See* page 59. This exemplary use of the invention indicates that a user can create his or her own compilation of previously stored content.

In contrast, Ferrel relates to a multimedia publishing system where the format and content can be separated and uploaded to a server by a publisher. *See* Abstract. Ferrel facilitates transmitting content to customers by separating the content from the formatting information and storing the infrequently changing format information in cache memory on the customer's computer and downloading only the predefined content information designed by a publisher.

Ferrel describes a multimedia publishing (MP) system that includes a viewer component 202 running on a customer workstation as shown in Fig. 2. In rejecting the claims, the Examiner takes the position that the viewer 202 corresponds to the claimed functional layer recited in claim 1. Fig. 6 shows an example of a screen display 360 of a page of a title (i.e., a publication such as a magazine) as displayed by the viewer 202 (see Fig. 2) on the visual display at the customer workstation 182. This screen in Fig. 6 shows a world news section of a publication using a page layout that has been previously designed. *See* col. 19, lines 54 - 59. Ferrel discloses that the objects and placement of the objects on the displayed page 360 "are determined by the publisher 102," (*see* col. 20, lines 13 - 15) but does not disclose the viewer creating or manipulating a compilation of content as required by claim 1. Claim 1 further recites that each module of the functional layer that interfaces with a user interface pertains to creation or manipulation of a compilation of content. Ferrel does not disclose the viewer creating or manipulating the compilation of content, but rather discloses that such operations are performed by the publisher ("the objects and placement of the objects on the displayed page 360 are determined by the publisher 102" col. 20, lines 13 - 14.) Accordingly, it is respectfully submitted that Ferrel's viewer does not include the function modules required by claim 1. Accordingly, it is respectfully submitted that Ferrel, as asserted in the Office Action, does not anticipate claim 1.

Independent claims 6 and 11 also recite a plurality of function modules each for executing a function pertaining to the creation and manipulation of a compilation of content. Accordingly, it is respectfully submitted that those claims are not anticipated by Ferrel for at least the same reasons as discussed above. Further, it is respectfully submitted that the remaining claims incorporate all the limitations of independent claims 1, 6 or 11, and hence, are patentable for at least the same reasons.

In view of the foregoing, Applicants respectfully request the Examiner to find the application in condition for allowance. However, if for any reason the Examiner believes that the application is not now in condition for allowance, the Examiner is respectfully requested to call the undersigned to resolve any issues and to expedite the disposition of the application.

Applicant hereby petitions for any extension of time that may be required to maintain the pendency of this case, and any required fee for such extension is to be charged to Deposit Account No. 05-0460.

Respectfully submitted,

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Version With Markings to Show Changes Made

Set forth below are the replacement paragraphs of the specification rewritten in the accompanying Amendment, marked up to show all changes relative to the previous version of those claims, in accordance with 37 C.F.R. §1.121(b)(1)(iii).

Amend the specification beginning at page 1, line 11 and ending at page 1, line 50, as follows.

A System and Method for Creating Compilations of Content,
[__/__,__] Serial No. 09/489,134 (Our reference Docket # STL000012US1)

Method and System for Adding Content to a Content Object Stored in a Data Repository
[__/__,__] Serial No. 09/489,576 (Our reference Docket # STL000013US1)   ;

Method and System for Adding User-Provided Content to a Content Object Stored in a Data Repository
[__/__,__] Serial No. 09/488,976 (Our reference Docket # STL000014US1)

Method and System for Moving Content in a Content Object Stored in a Data Repository
[__/__,__] Serial No. 09/488,971 (Our reference Docket # STL000015US1)

Method and System for Removing Content in a Content Object Stored in a Data Repository
[__/__,__] Serial No. 09/489,087 (Our reference Docket # STL000016US1)

Prerequisite Checking in a System for Creating Compilations of Content
[__/__,__] Serial No. 09/488,969 (Our reference Docket # STL000017US1)

Method and System for Preventing Mutually Exclusive Content Entities Stored in a Data Repository
[__/__,__] Serial No. 09/489,265 (Our reference Docket # STL000018US1)

Volume Management Method and System for a Compilation of Content
[__/__,__] Serial No. 09/489,090 (Our reference Docket # STL000019US1)

Method and System for Calculating Cost of a Compilation of Content
[__/__,__] Serial No. 09/489,143 (Our reference Docket # STL000020US1)

Method and System for Storing Hierarchical Content Objects in a Data Repository
[__/__,__] Serial No. 09/489,570 (Our reference Docket # STL000021US1)

File Structure for Storing Content Objects in a Data Repository
[__/__,___] Serial No. 09/489,730 (Our reference Docket # STL000022US1)

A Hitmask for Querying Hierarchically Related Content Entities
[__/__,___] Serial No. 09/489,133 (Our reference Docket # STL990182US1)

A Method and Configurable Model for Storing Hierarchical Data in a Non-Hierarchical Data Repository
[__/__,___] Serial No. 09/489,561 (Our reference Docket # STL000025US1)

Reference to a Computer Listing Appendix

Appendix A to this application is set forth on a single compact and the material recorded thereon is incorporated by reference herein. The following file is recorded on the compact disc: file name: AppendixA.txt; file size: 107kB; date of creation: April 24, 2002.--

Amend the paragraph beginning at page 6, line 10, as follows.

Fig. [25] 24 is a state diagram representing the states of a user, request and CBO at various stages of the process for creating compilations of content.

Claims

Set forth below are the claims rewritten in the accompanying Amendment, marked up to show all changes relative to the previous version of those claims, in accordance with 37 C.F.R. §1.121(c)(ii).

1.   (Amended) A method for facilitating creation and manipulation of compilations of content, comprising the step of:

[Providing] providing a functional layer for interfacing with a user interface and a data

repository containing a plurality of content entities, the functional layer comprising a plurality of

function modules, each module for executing a function pertaining to the creation or

manipulation of a compilation of content.

2.   (Amended) The method of claim 1, wherein one of the function modules creates a list of

content [entitiy] entity identifiers defining the content and order of a compilation.

4.   (Amended) The method of claim 1, wherein the compilation is hierarchically structured

and wherein one of the function modules creates an outline of containers and content [entitiy]

entity identifiers defining the content and hierarchical structure of a compilation.

7.   (Amended) The [method] program storage device of claim 6, wherein one of the

function modules creates a list of content entity identifiers defining the content and order of a

compilation.

8.   (Amended) The [method] program storage device of claim 7, wherein at least one of the

function modules manipulates the list to redefine the content or order of the compilation.

9.   (Amended) The [method] program storage device of claim 6, wherein the compilation is

hierarchically structured and wherein one of the function modules creates an outline of

containers and content entity identifiers defining the content and hierarchical structure of a

compilation.

10.   (Amended) The [method] program storage device of claim 9, wherein at least one of the

function modules manipulates the outline to redefine the content or structure of the compilation.

12. (Amended) The system of claim 11, wherein one of the function modules further comprises means for creating a list of content [entitiy] entity identifiers defining the content and order of a compilation.

14. (Amended) The system of claim 11, wherein the compilation is hierarchically structured and wherein one of the function modules further comprises means for creating an outline of containers and content [entitiy] entity identifiers defining the content and hierarchical structure of a compilation.